

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

The Sustainability Institute, et al.,) Civil Action Number: 2:25-cv-02152-RMG
Plaintiffs,)
vs.)
DONALD J. TRUMP, in his official)
capacity as President of the United States,)
et al.,)
Defendants.)

DEFENDANTS' MOTION FOR PROTECTIVE ORDER AND RELATED RELIEF

Pursuant to this Court's Order (ECF No. 45), Rule 26(b)(5) and (c) of the Federal Rules of Civil Procedure, and Rule 26.08 of the Local Civil Rules (D.S.C.), Defendants move the Court to enter an order protecting the specific documents lodged under seal by Defendants today as protected from disclosure by the attorney-client privilege, work product protection, and deliberative process privilege (collectively, the "Protected Material"). Consistent with this Court's Order (ECF No. 45) and Rule 26(b)(5)(A) of the Federal Rules of Civil Procedure, Defendants also are producing privilege logs to expressly make the claims and describe the nature of the documents, communications, or tangible things not produced or disclosed in a manner that will not reveal privileged or protected information but will enable assessment of the claims.

In light of the compressed time allowed for gathering and producing documents of four different federal agencies to respond to the Court's Order (ECF No. 45), including gathering and segregating the Protected Material of those agencies, pursuant to Rule 6.01 of the Local Civil Rules (D.S.C.), Defendants respectfully request that the Court enlarge the time by thirty (30) days for Defendants to provide further support regarding the privileges and/or protections applicable to the

Protected Material. This deadline has not previously been extended and the extension would not affect other deadlines. Opposing counsel was contacted but was unable to provide consent.

Respectfully submitted,

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